

# **Exhibit 1**

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**From:** Prabhakar, Saurabh  
**Sent:** Thursday, September 7, 2023 9:41 AM  
**To:** 'John L. Wood'; Cheryl G. Rice; 'Ashley, Matt'  
**Cc:** Extreme; 'Chuck Lee'; Jessica Malloy-Thorpe; 'Weber, Olivia'  
**Subject:** SNMP Research, Inc. et al. v. Broadcom Inc., et al. -- claw back of privileged information

Counsel:

Pursuant to Paragraph 51 of the Protective Order (Dkt. 93), Extreme notifies Plaintiffs that it inadvertently produced privileged information and is clawing those documents back. Specifically, Extreme is clawing back documents produced with bates numbers EXTREME-00691563, EXTREME-00706835, EXTREME-00693693, EXTREME-00693860, EXTREME-00693878, EXTREME-00693885, EXTREME-00693891, and EXTREME-00693899.

These documents contain Extreme's and Brocade's attorney-client privileged communications and common-interest communications between Brocade's in-house counsel and Extreme's in-house counsel reflecting evaluation of Brocade's existing contracts in the course of and following Extreme's acquisition of Brocade's data center networking business and legal advice related to the interpretation and assignment of the contracts. Extreme will follow up with a more formal privilege log tomorrow.

Extreme expects SNMPR to comply with Paragraph 51 of the Protective Order. Please destroy and confirm to Extreme in writing that the information and all copies thereof have been destroyed no later than five business days from today.

Best regards

**Debevoise  
& Plimpton**

**Saurabh Prabhakar** (he/him/his)

Associate

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**From:** Prabhakar, Saurabh  
**Sent:** Monday, September 11, 2023 6:03 PM  
**To:** 'John L. Wood'; 'Cheryl G. Rice'  
**Cc:** Extreme; 'Chuck Lee'; Jessica Malloy-Thorpe; 'Ashley, Matt'; 'Weber, Olivia'  
**Subject:** SNMP Research, Inc. et al. v. Broadcom Inc., et al. -- claw back of privileged information

Counsel:

Pursuant to Paragraph 51 of the Protective Order (Dkt. 93), Extreme notifies Plaintiffs that it inadvertently produced privileged information and is clawing those documents back. Specifically, Extreme is clawing back documents produced with bates numbers EXTREME-01076584; EXTREME-01076396; EXTREME-01076414; EXTREME-01078472; EXTREME-01079442; EXTREME-01076384; EXTREME-01076335; EXTREME-01076304; and EXTREME-01076414.

These documents contain Extreme's attorney-client privileged communications and attorney work-product communications reflecting attorney mental impressions and ideas, and request for and conveyance of legal advice related to litigation and settlement thereof. Extreme has updated its privilege log to reflect the privileged nature of these communications.

Extreme expects SNMPR to comply with Paragraph 51 of the Protective Order. Please destroy and confirm to Extreme in writing that the information and all copies thereof have been destroyed no later than five business days from today.

Best regards

**Debevoise  
& Plimpton**

**Saurabh Prabhakar** (he/him/his)  
Associate

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**From:** Prabhakar, Saurabh  
**Sent:** Wednesday, September 20, 2023 7:15 AM  
**To:** 'John L. Wood'; Cheryl G. Rice; 'Ashley, Matt'  
**Cc:** Extreme; 'Chuck Lee'; Jessica Malloy-Thorpe; 'Weber, Olivia'  
**Subject:** SNMP Research, Inc et al. v. Broadcom Inc., et al. -- claw back of privileged information

Counsel:

Pursuant to Paragraph 51 of the Protective Order (Dkt. 93), Extreme notifies Plaintiffs that it inadvertently produced privileged information and is clawing those documents back.

The first set of documents contain Extreme's attorney-client privileged communications and attorney work-product communications reflecting attorney mental impressions and ideas, and request for and conveyance of legal advice related to litigation and settlement thereof. The communications being clawed back constitute four email chains, three of which (Email Chains 1 to 3) share a single origin email:

**Email Chain 1:**

EXTREME-01076994; EXTREME-01076973; EXTREME-01076952; EXTREME-01076932; EXTREME-01076912; EXTREME-01076892; EXTREME-01076872; EXTREME-01076853; EXTREME-01076834; EXTREME-01076814; EXTREME-01076795; EXTREME-01076776; EXTREME-01076758; EXTREME-01076740; EXTREME-01076722; EXTREME-01076705; EXTREME-01076688; EXTREME-01076672; EXTREME-01076656; EXTREME-01076641; EXTREME-01076626; EXTREME-01076611; EXTREME-01076596; EXTREME-01076570; EXTREME-01076552; EXTREME-01076539; EXTREME-01076520; EXTREME-01076508; EXTREME-01076496; EXTREME-01076484; EXTREME-01076474; EXTREME-01076464; EXTREME-01076454; EXTREME-01076432; EXTREME-01076405; EXTREME-01076396; EXTREME-01077498; EXTREME-01077488; EXTREME-01077479; EXTREME-01077469; EXTREME-01077460; EXTREME-01077451; EXTREME-01077442; EXTREME-01077434; EXTREME-01077426; EXTREME-01077418; EXTREME-01077410; EXTREME-01077403; EXTREME-01077396; EXTREME-01077390; EXTREME-01077384; EXTREME-01077378; EXTREME-01077373; EXTREME-01077368; EXTREME-01077349; EXTREME-01077329; EXTREME-01077325; EXTREME-01077321; EXTREME-01077238; EXTREME-01077235; EXTREME-01077232; EXTREME-01077230; EXTREME-01077207; EXTREME-01077184; EXTREME-01077182; EXTREME-01077159; EXTREME-01077136; EXTREME-01077114; EXTREME-01077092; EXTREME-01077060.

**Email Chain 2:**

EXTREME-01076584; EXTREME-01076384; EXTREME-01076376; EXTREME-01076365; EXTREME-01076357; EXTREME-01076346; EXTREME-01076335; EXTREME-01076325; EXTREME-01076315; EXTREME-01076304.

**Email Chain 3:**

EXTREME-01077284; EXTREME-01077042; EXTREME-01077033; EXTREME-01077024; EXTREME-01077015; EXTREME-01076443; EXTREME-01076423; EXTREME-01076414; EXTREME-01077051; EXTREME-01077354; EXTREME-01077334; EXTREME-01077308; EXTREME-01077296; EXTREME-01077272; EXTREME-01077262; EXTREME-01077251; EXTREME-01077241; EXTREME-01077082.

**Email Chain 4:**

EXTREME-01078470; EXTREME-01079442.

A second set contains a single document that contains Extreme's attorney-client privileged communications: EXTREME-00691752.

Extreme will be producing a privilege log for these documents. Based on SNMPR's prior requests, the privilege log will have the Bates numbers associated with the entries. But Bates numbers associated with them should no longer be considered valid and SNMPR should no longer have Bates numbered copies of them. *See* Dkt. 93 at ¶51 ("When a Designating Party identifies such information as privileged or protected, a Receiving Party . . . shall . . . destroy and confirm to the Designating Party in writing that the information and all copies thereof have been destroyed.")

Extreme expects SNMPR to comply with Paragraph 51 of the Protective Order. Please destroy and confirm to Extreme in writing that the information and all copies thereof have been destroyed no later than five business days from today.

Best,

**Debevoise  
& Plimpton**

**Saurabh Prabhakar** (he/him/his)  
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